

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIAN K. REINBOLD,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 04-342(GMS)
	:	
NALC LOCAL 1977 ,	:	
	:	
Defendant.	:	

BRIAN K. REINBOLD,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A.No. 05-47(GMS)
	:	
UNITED STATES POSTAL SERVICE	:	
and NALC LOCAL 191,	:	
	:	
Defendants.	:	

Initial Disclosures Of United States Postal Service

A. Individuals Likely to Have Discoverable Information

1. Gregory L. Vandever, USPS Customer Relations Coordinator

Has knowledge of March 25, 2003, June 4, 2003, and November 20, 2003 grievances.

2. Francisco R. Rendon, Supervisor, Customer Services

Has knowledge of July, 2003 and August 11, 2003 suspensions and Step 1 grievance.

3. Eileen Muzzi, Manager, Customer Services

Same as Mr. Rendon.

4. Denise Royster-Simms, Letter Carrier

Has knowledge fo the Request for Disciplinary Action regarding the July 7, 2003

5. Norman Diehl, Jr., Function-4 Team Member/Auditor

Has knowledge regarding Plaintiff's alleged discarding of deliverable mail, discovered July 25, 2003.

6. Eduardo Gonzalez, Supervisor Customer Services

Same as Mr. Diehl.

7. Isacce Morris, Labor Relations Specialist

Has knowledge of the Disciplinary Action Request of November, 2003.

8. Dennis R. Money, Jr., Supervisor Customer Services

Has knowledge of the November 6, 2003 disciplinary action, and the July 2004 notice of removal.

9. Edward DiDomenico,USPS Management Step B Designee

Has knowledge of the resolution of Plaintiff's grievance regarding his removal.

10. Douglas F. Shiflet, Postmaster

Has knowledge of the September, 2004 suspension.

11. Kevin Burns, Supervisor, Customer Services

Has knowledge of route inspection of May 16, 2003.

12. Lizzie Wright, Letter Carrier

Has knowledge of instructions from Dennis Money to Plaintiff on July 10, 2004.

13. Bill Martin, Letter Carrier

Same as Lizzie Wright.

14. Karla Aguirre, Letter Carrier

Has knowledge of Plaintiff's use of overtime on October 20, 2004.

All these individuals may be reached through the undersigned.

B. Documents and Tangible Things

Attached, Bates Numbered RIN00001 through RIN00200

C. Damages

Not applicable.

D. Insurance

Not applicable.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By: s/
PATRICIA HANNIGAN
Assistant United States Attorney
Delaware State Bar No. 2145
700 Orange Street, Suite 700
Wilmington, Delaware 19899-2046

Dated: July 7, 2005

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CERTIFICATE OF SERVICE

I, Jennifer Brown, an employee in the Office of the United States Attorney, hereby certify under penalty of perjury that on July 7, 2005, I electronically filed:

Initial Disclosures Of United States Postal Service

with the Clerk of Court using CM/ECF. Said document is available for viewing and downloading from CM/ECF, which will send notification of such filing(s) to the following:

Susan E. Kaufman (DSB#3381)
800 King Street, Suite 303
Wilmington, DE 19801-1674

Two copies served via U.S. Mail to the following:

Brian K. Reinbold
3909 Delaware Street
Apartment #B
Wilmington, DE 19808-5709

/s/
Jennifer Brown